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8 *Attorneys for Defendants*
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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
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13 IN RE GERON CORPORATION
14 STOCKHOLDER DERIVATIVE
15 LITIGATION
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Master File No. 3:20-cv-02823-WHA

**DECLARATION OF RYAN E. BLAIR IN
RESPONSE TO PLAINTIFFS'
ADMINISTRATIVE MOTION TO CONSIDER
WHETHER ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED (ECF No. 30)**

This Document Relates to All Actions

1 I, Ryan E. Blair, declare as follows:

2 1. I am a partner with the law firm of Cooley LLP. I am a member of good standing
3 duly licensed by the State of California and I am admitted to practice before this Court. I am
4 counsel of record for Defendants Geron Corporation (“Geron”), Dr. John Scarlett, Karin Eastham,
5 Dr. V. Bryan Lawlis, Dr. Susan Molineaux, Dr. Robert Spiegel, Olivia Bloom, Daniel Bradbury,
6 Hoyoung Huh, and Stephen Rosenfield (together, “Defendants”) in the above-captioned action.
7 The matters set forth herein are of my own personal knowledge, and if sworn as a witness, I could
8 competently testify regarding them. I am submitting this declaration in response to Plaintiffs’
9 Administrative Motion to Consider Whether Another Party’s Materials Should Be Filed Under Seal
10 and Notice of Lodging Pursuant to Civil Local Rule 79-5, filed on June 7, 2022 (ECF No. 30)
11 (“Administrative Motion to Seal”).

12 2. This declaration is filed pursuant to Civil Local Rule 79-5(f)(3).

13 3. On June 7, 2022, Plaintiffs Katherine Jameson and Zachary Gamlieli (together,
14 “Plaintiffs”) filed their Verified Consolidated Shareholder Derivative Complaint (“Consolidated
15 Complaint”), as well as the Administrative Motion to Seal certain non-public information
16 referenced in the Consolidated Complaint.

17 4. The information that Plaintiffs propose be redacted in the Consolidated Complaint
18 was produced to Plaintiffs in response to a Section 220 demand under the Delaware General
19 Corporation Law and pursuant to a confidentiality agreement intended to protect the confidential
20 nature of the non-public materials produced by Geron.

21 5. Notwithstanding the confidential nature of the produced materials, Defendants have
22 no objection to the Consolidated Complaint being filed in its entirety on the public docket.
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1 Dated: June 13, 2022

COOLEY LLP

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3 /s/ Ryan Blair

4 Ryan Blair (246724)

5 Attorneys for Defendants

GERON CORPORATION, DR. JOHN A.

6 SCARLETT, KARIN EASTHAM, DR. V. BRYAN

LAWLIS, DR. SUSAN M. MOLINEAUX, DR.

7 ROBERT J. SPIEGEL, OLIVIA BLOOM, DANIEL

M. BRADBURY, HOYOUNG HUH, and

8 STEPHEN N. ROSENFELD